

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: BOY SCOUTS OF AMERICA
AND DELAWARE BSA, LLC,

Debtors.

NATIONAL UNION FIRE INSURANCE
CO. OF PITTSBURGH, PA, et al.,

Appellants,

v.

BOY SCOUTS OF AMERICA AND
DELAWARE BSA, LLC,

Appellees.

Chapter 11

Bankruptcy Case No. 20-10343 (LSS)

(Jointly Administered)

Case No. 22-cv-01237-RGA

**STATEMENT PURSUANT TO LOCAL RULE 7.1.1 RE:
RENEWED EMERGENCY MOTION OF LUJAN CLAIMANTS
FOR STAY PENDING APPEAL AND MOTION TO STAY APPEALS**

The undersigned hereby certifies that on August 18, 2023, undersigned counsel for the Lujan Claimants was advised that counsel for the D&V Claimants, who have filed a similar renewed motion for a stay pending appeal, had spoken telephonically with counsel for the Debtors and that the Debtors would not consent to a stay pending appeal. Subsequently, undersigned counsel emailed Delaware counsel to the Debtors (with a cc to counsel to other parties-in-interest) and, while offering to speak telephonically, asked counsel to the Debtors simply to confirm

that Debtors would not consent to a stay pending appeal as to the Lujan Claimants either. Counsel to the Debtors so confirmed via email.

DATED: August 18, 2023

Respectfully submitted,

/s/ Christopher D. Loizides
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*Delaware Counsel to Lujan
Claimants*